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Federal Communications Commission
Wireless Telecommunications Bureau
Washington, D.C.

To whom it may concern:

I hold an Amateur Extra Class amateur radio license; my callsign is K7UIJ. I write to comment on the Notice of Proposed Rulemaking and Order in WT Docket 05-235. I oppose dropping of the Morse code requirement for amateur radio licenses with HF privileges.

The regulation defining the amateur radio service reads in part:

§97.1 Basis and purpose.

The rules and regulations in this Part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

I Interpret this regulation as indicating that the Federal Communications Commission intends to encourage and foster a communications service prepared to handle emergencies, both expected and unexpected. It seems to me that this implies that amateur operators should be expected to have knowledge of a wide variety of communications modes and techniques from the basic to the sophisticated. Use of the Morse code for communications is perhaps the most basic communications mode possible. Morse transmissions can be received when nothing else but perhaps some digital transmissions are intelligible. Moreover, even in the case of communications via VHF or UHF walkie-talkies, knowledge of Morse code might prove useful if the modulation circuitry failed.

It is certainly true that the advent of modern VHF/UHF radios and repeater systems and cellular telephone systems makes knowledge of Morse code irrelevant in most run-of-the-mill emergencies. But what if regular communications systems are gone? Hurricanes Katrina and Willma show

that this possibility is all-too-real. I can easily imagine a scenario wherein repeater systems are down and communication is via FM handheld transceivers with signal strengths insufficient for intelligible FM modulation but good enough to distinguish a signal from the noise. In this case, use of the push-to-talk switch would allow Morse code to be sent and received. This may seem far-fetched but a handheld radio *was* used by an American fighter pilot downed in Yugoslavia to call for help by sending code with the push-to-talk switch because the Serbian soldiers looking for him were so close that had he spoken, they would have heard him.

I also consider that elimination of the Morse code requirement is unnecessary; a five words per minute code test is easily passed by almost all prospective radio amateurs. In my estimation, it is one of the things which tangibly distinguishes the amateur radio service from, say, the family radio service or the citizens band service. In my view, passage of the code test helps to instill a sense of pride and shared *esprit de corps* in the amateur service.

I therefore strongly urge that WT Docket 05-235 be amended to eliminate abolishment of the Morse code requirement to obtain amateur licenses with HF privileges.

Sincerely,

Michael Freeman